

MAY 03 2016

Mr. Lawrence C. Rosen  
Environmental Operations, Inc  
1530 South Second Street, Suite 200  
St. Louis, Missouri 63104-4500

Dear Mr. Rosen:

RE: Comments on the Risk Evaluation Memorandum Dated for the Solutia - J.F. Queeny Site,  
St. Louis, Missouri  
EPA ID No. MOD004954111

The U.S. Environmental Protection Agency in consultation with the Missouri Department of Natural resources is providing the following comments to be incorporated into the focused Risk Evaluation to be prepared for the subject site.

1. What EOI is preparing to develop is not a baseline risk assessment as defined by the EPA, and should be called a focused risk evaluation. A baseline risk assessment is an analysis of the potential adverse health effects (current or future) caused by hazardous substance releases from a site in the absence of any actions to control or mitigate these releases (i.e., under an assumption of no action). As previously agreed to, and due to the understanding that current site use restrictions will remain in place, it is not necessary to evaluate all of the exposure routes at the site.
2. To select COPCs, the maximum detected concentration should be compared to the lesser of the 1E-06 cancer risk level and the non-cancer hazard quotient of 0.1.
3. The memorandum states, "The chemicals contributing the most to the overall cumulative risk, for each receptor, will be determined to be chemicals of concern." This statement leaves uncertainty in how COCs will be selected. At a minimum PCE, TCE, and their degradation compounds should be COCs included in the cumulative risk calculation.

As we agreed to in our recent conference call, a revised Corrective Measures Study Report will be submitted to the agencies within 60 days of receiving these comments. Should you have any questions or concerns on the CMS development, please contact me at (913) 551-7755.

Sincerely,

Bruce A. Morrison  
Project Manager  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

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CONCURRENCES		
SYMBOL	WRAP	WRAP
NAME	Morrison	Johnson
INITIALS/DATE	BAM 4-29-16	BJJ 5/3/16

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cc: Christine Kump-Mitchell, MDNR  
Rich Nussbaum, MDNR  
Stacy Hastie, SWH Investments  
Eric Page, EOI